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Food Safety Initiative Strategic Plan

Federal Docket #97N-0074

I **believe** one agency should be in charge of Meat and Poultry Inspection, not the four **that** have their interest in this presently,

In the 1<sup>st</sup> and 4<sup>th</sup> meetings, ( 10/02/98 and 12/08/98), that I was present, very little was spoken about the way these **farm** animals were treated on the farm, in transit and at the **federally** inspected **Slaughter** Plant.

In this strategic **plan**, **Farm to Table**, the 1<sup>st</sup> step is to make sure that these animals **are** housed properly, with good movement and exhaust of the **air that these animals breathe**. Also an important **consideration** is the size or room that **these** animals have; to prevent crowding, enough room to lay down and rest, plus **enough** room that the standing cows do **not** step on the cows laying down. **If** these measures were **followed**, This would **greatly** decrease the respiratory problems **in** these animals, which is on the increase and also excessive bruising **of the** meat.

In my almost 10 ½ years in **FSIS**, I have personally seen situations where **1** agency does not know what the other one is doing, and it **j ust** becomes an embarrassment.

Somebody also **has** to take charge **of the illegal** and/or misuse of steroids, hormones and **specially** antibiotics in dairy cow farming. In other words, who is going **to** regulate that **these** animals for human consumption are free **of physical**, chemical and biological contamination? It has been **said that due to** the overuse of **these** contaminants, we presently have strains of bacteria that are smarter than these contaminants and are resistant to them. **especially** antibiotics, **Non-ambulatory** animals on the farm are mistreated and sometimes **literally** dragged on all kind **of** surfaces. This is inhumane and should be stopped.

Transporting of **these** animals is another key issue. Somebody should take active participation in regulating the maximum animals that can **be** transported on different size vehicles, time cards to show **1-tow long** these animals were transported and if they were fed or watered. Penalties should be established for mistreatment of these animals. These animals, if they go down in transportation, should **not** be dragged **conscience from** the truck to the Federal Plant **Loading Dock**. **There** should be something done **about** transporting **these** animals in extreme weather conditions; high wind **chill factors**, very low temperatures or even very high temperatures.

At the **Federal Plant**, these animals should have adequate space before they are **slaughtered**, food and water available and pens cleaned out on a regular basis.

**Attachments:** 1. Letter to Commissioner: U.S. Food and Drug Administration



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2. "How we treat the animals we eat, by Farm Sanctuary"

Respectfully submitted by

Lester Friedlander, B.A., D.V.M.  
and on behalf of  
Mrs. Christine Stevens and The  
Animal Welfare Institute



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08/30/98

To: Commissioner  
U.S. Food and Drug Administration  
Dockets Management Branch  
Room 1-23  
12420 Parklawn Drive  
Rockville, MD 20857

From: Dr.. Lester Friedlander

Subject: Disallowing the use of non-ambulatory animals  
for human food.

I urge the Food and Drug Administration to act on Docket Number 98P-0151/CP1 and stop the slaughter of downed animals for the human food supply.

I was an USDA, FSIS Veterinarian, from January 1985 to April 1995. I was the supervisory Veterinary Medical Officer (SVMO), for the largest culled cow slaughter in the United States.

I have literally seen thousands of non-ambulatory cattle (Downers), being slaughtered, which in my professional judgment, should have been condemned.

Due to the very liberal policy on non-ambulatory animals and the ineffective Inspection Process, they are generally passed "to be slaughtered. USDA-FSIS does not use any scientific or microbiological testing to determine their true condition.

If these downers pass for human food they are ground up for the federal school lunch program or often sold to fast food restaurant. In either event our children's health are jeopardized.

The USDA claims that animals with Central Nervous System (CNS), are kept out of the food supply. As somebody who has trained close to one hundred (100) veterinarians in USDA and received the Veterinary trainer of the year award; I can tell you that CNS animals are not carefully examined nor prevented from entering the food supply.

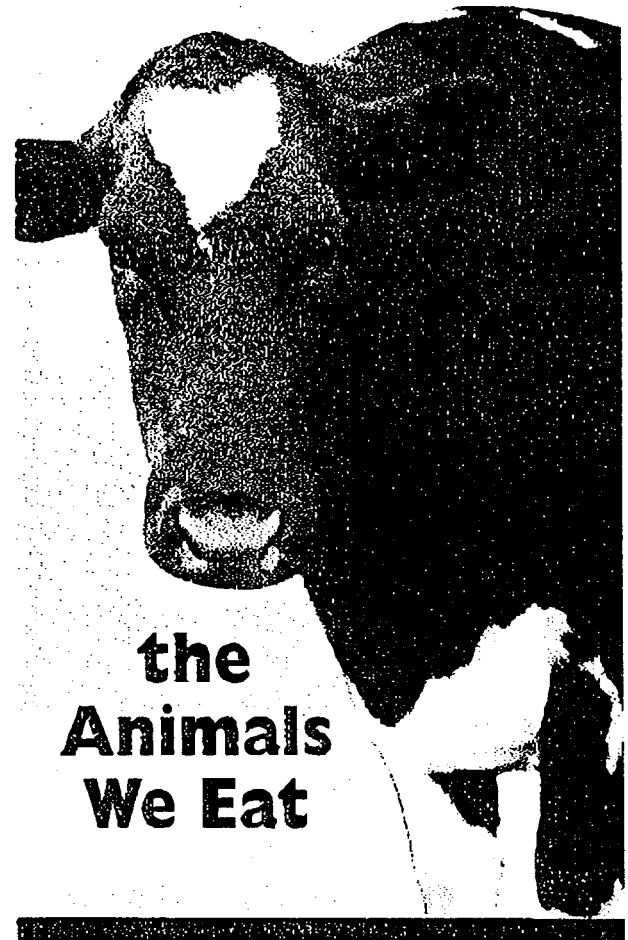
These statements are based on my professional judgment and personal on the job experience.

Thank You,

*Lester Friedlander, DVM*  
Lester Friedlander, DVM

Attachment #1

**How We  
Treat**



**the  
Animals  
We Eat**

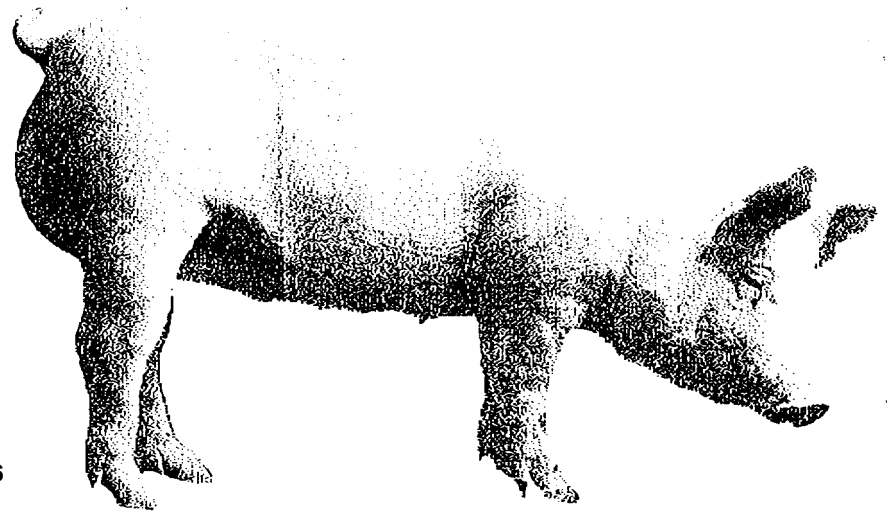
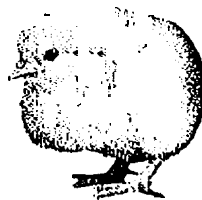
Attachment # 2

Every year, over **eight billion** farm animals are raised, **transported**, and slaughtered **under** inhumane conditions. The misery begins **during** production, where animals are raised **on** large-scale "factory farms" enduring months, or even years, in overcrowded, intensive confinement operations. Laying **hens**, **veal** calves, and breeding sows **live** in cages or crates so **small** that they **cannot** even turn around or stretch **their** limbs. Turkeys and chickens are crammed by the thousands into large, **filthy warehouses**. **Dairy cows** are forced to produce 10 times more milk than they would in nature and then are slaughtered for ground beef **when they are worn out**, **Millions** of unwanted male egg-type chicks are discarded alive in dumpsters because they do **not** lay eggs and are bred too small to be "profitable" for the meat industry.

**A**nimals who survive the production line suffer more torment during transportation and **marketing**. Animals used for **food production** may **legally** be transported up to 36 hours without food or water. During **transport**, animals are **crowded** into trucks, and **suffer** from **stress**, **inadequate ventilation**, and **trampling injuries**. Every year, tens of thousands of animals become so **sick or injured** that they **cannot** even walk. The **meat industry** calls them "downers"—and because **they** can still be sold for food, **downed** animals are dragged to slaughter with chains, or dumped alive on stockyard 'deadpiles' when they are no longer "profitable."

**U**pon arriving at **the** slaughterhouse, frightened **animals** are hit with canes, kicked, and **shocked** with **electric prods** to herd them to the killing floor. **Stunning** is not **legally required** for the majority of animals slaughtered (poultry which **comprise** over 90% of "food animals" are not covered under "The Humane Slaughter Act"), **Even** where **stunning** is used, **industry** reports indicate **an alarming failure** rate. Standard slaughter practices, **combined** with **gross negligence**, result in **immense pain** and **suffering** for **millions of animals**. **Slaughterhouses** are filled with the anguished **cries** of animals, as they are hoisted by one leg, and then slowly **bled** to death. The meat and poultry industries admit that some animals reach the scalding tank while they are fully conscious, and are **boiled** alive.

**Federal laws** do not adequately protect farm animals, and most state anti-cruelty laws specifically exclude animals used for "food" production. Severe confinement, painful mutilations, dragging and shocking, and even **abandoning** farm animals are considered "normal animal agricultural practices" under the law.



**F**arm animals have been purposely bred to grow larger and faster, despite severe animal welfare problems associated with this practice. An industry report states; "...turkeys have been bred to grow faster and heavier but their skeletons haven't kept pace, which causes 'cowboy legs.' Commonly, the turkeys have problems standing....and fall and are trampled on or seek refuge under the feeders, leading to bruises . . . or killed birds." (Feedstuffs)

'overcrowding is the industry norm, because the profits generated by the practice are greater than the losses associated with it. A hog expert writes; "Death losses during transport are too high — amounting to more than \$8 million per year. But it doesn't take a lot of imagination to figure out why we load as many hogs on a truck as we do. It's cheaper." (Lancaster Farming)

**S**peed, not humane considerations, guides the slaughter process as assemblylines are moving faster to increase profits. A study of calf slaughter handling and processing practices found; "Approximately half of the calf slaughterers in the U.S. shackle calves while they are still alive" despite the fact this is illegal under the federal "Humane Slaughter" law. (Meat & Poultry)

Attachment #2 131